

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846-swr

Debtor.

Hon. Steven W. Rhodes

**CERTIFICATION OF COUNSEL REGARDING ORDER GRANTING
MOTION TO COMPEL FULL CLAWBACK OF DEBTOR'S DOCUMENT
PRODUCTION AND RELATED RELIEF**

Pursuant to the Order Granting Motion to Compel Full Clawback of Debtor's Document Production and Related Relief entered by this Court on May 13, 2014 [Docket No. 4710], the undersigned counsel for the Retired Detroit Police & Fire Fighters Association ("RDPFFA"), Donald Taylor, individually, and as President of the RDPFFA, and the Detroit Retired City Employees Association ("DRCEA") and Shirley V. Lightsey, individually, and as President of the DRCEA (collectively "Retiree Association Parties"), hereby certifies that the hard drive containing the Debtor's May 6, 2014 document production was sent by overnight courier to the Debtor's counsel on May 14, 2014.

The undersigned further certifies that no electronic physical copies of the document production were made by the Retiree Association Parties and no work

product reflecting the contents of any document in the production was generated by the Retiree Association Parties.

LIPPITT O'KEEFE GORNBEIN, PLLC

By: /s/ Ryan C. Plecha
Brian D. O'Keefe (P39603)
Ryan C. Plecha (P71957)
Attorneys for Retiree Association Parties
370 East Maple Road, 3rd Floor
Birmingham, Michigan 48009
Tel: (248) 646-8292; Fax: (248) 646-8375
bokeefe@lippittokeefe.com
rplecha@lippittokeefe.com

SILVERMAN & MORRIS, P.L.L.C.

Thomas R. Morris (P39141)
Karin F. Avery (P45364)
Co-counsel for Retiree Association Parties
30500 Northwestern Hwy., Suite 200
Farmington Hills, Michigan 48334
Tel: (248) 539-1330; Fax: (248) 539-1355
morris@silvermanmorris.com
avery@silvermanmorris.com

Dated: May 14, 2014